

District Judge James L. Robart
Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE,

Petitioner-Plaintiffs,

v.

DREW BOSTOCK, *et al.*,

Respondents-
Defendants.

Case No. C24-0326-JLR-SKV

STIPULATED MOTION TO EXTEND
DEADLINE AND [PROPOSED]
ORDER

Noted for Consideration:
July 26, 2024

The parties, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to extend Respondents' deadline to file a return to the habeas petition to August 28, 2024. This Court has extended this deadline once before and Respondents' current deadline to file a return is July 29, 2024. Dkt. No. 22, Order. Good cause exists for a second extension of this deadline to August 28, 2024.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

Since the parties' last filing, the Immigration Judge issued a final order of removal and Petitioner waived appeal. Petitioner has filed an application with U.S. Citizenship and Immigration Service ("USCIS") that may allow her to remain in the United States. She has also submitted a request to U.S. Immigration and Customs Enforcement ("ICE") for an administrative stay of her removal. ICE requires a preliminary determination from USCIS before it can decide this request. Accordingly, an extension will provide the time for the agencies to process and save resources of the parties and this Court.

Accordingly, the parties respectfully request that the Respondents' deadline to file a return be extended to August 28, 2024.

DATED this 26th day of July, 2024.

Respectfully submitted,

TESSA M. GORMAN

RIGHTS BEHIND BARS

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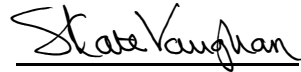
I certify that this memorandum contains 236 words, in compliance with the Local Civil Rules.

Attorneys for Petitioner-Plaintiffs

[PROPOSED] ORDER

For good cause, Respondents' deadline to file a return is extended to **August 28, 2024**. It is so **ORDERED**.

DATED this 29th day of July, 2024.



S. KATE VAUGHAN
United States Magistrate Judge